UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al., Debtors.¹

PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

This filing relates to the Commonwealth, HTA, and ERS.

NOTICE OF FILING OF REVISED PROPOSED ORDER AND AMENDED SCHEDULES FOR ONE HUNDRED AND FOURTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS ASSERTING INTERESTS BASED ON SALARY DEMANDS, EMPLOYMENT OR SERVICES PROVIDED

To the Honorable United States District Judge Laura Taylor Swain:

1. Scheduled for hearing on January 29, 2020 are various objections to proofs of claim filed against the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority ("HTA"), and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico ("ERS", and together with the Commonwealth,

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801)(Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Case:17-03283-LTS Doc#:10466 Filed:01/28/20 Entered:01/28/20 11:43:38 Desc: Main Page 2 of 3 Document

the "Debtors").

2. Since the filing of the One Hundred and Fourth Omnibus Objection (Non-

Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation

Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto

Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services

Provided ("One Hundred and Fourth Omnibus Objection"), the Debtors have received additional

supplemental mailings submitted by claimants subject thereto. In order to review these additional

supplemental mailings, and in particular, to evaluate whether such claimants shall be transferred

into the administrative reconciliation process, the Debtors filed the Notice of (A) Adjournment as to

Certain Claims (the "Notice of Adjournment") on January 22, 2020 [ECF No. 10306], and the Second

Notice of (A) Adjournment as to Certain Claims on January 24, 2020 [ECF No. 10398].

3. The Debtors respectfully submit as Attachment 1 hereto a revised proposed order

on the One Hundred and Fourth Omnibus Objection and an accompanying amended schedule of

claims subject to the One Hundred and Fourth Omnibus Objection.

Dated: January 28, 2020

San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

Carla García Benítez

USDC No. 203708

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

2

Fax: (787) 753-8944

Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Commonwealth, HTA, and ERS

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*) Brian S. Rosen (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square New York, NY 10036 Tel: (212) 969-3000

Fax: (212) 969-2900

Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Commonwealth, HTA, and ERS